

Remarks

Claims 1-16 are currently pending in the patent application. For the reasons and arguments set forth below, Applicant respectfully submits that the claimed invention is allowable over the cited references.

In the instant Office Action dated July 31, 2007, the following objection and rejections are noted: claim 16 is objected to under 37 CFR 1.75(c) as being in improper form; claims 1-7, 9-13, and 15 stand rejected under 35 U.S.C. 102(b) over Heinlen *et al.* (U.S. Patent 3,736,367); claims 8 and 14 stand rejected under 35 U.S.C. 103(a) over Heinlen *et al.* as applied to claim 13 above in view of Sakamoto *et al.* (U.S. Patent No. 6,975,022).

Regarding the objection to claim 16 based on the claim being in improper multiple dependent claim form, Applicant has amended claim 16 to refer to other claims in the alternative only as indicated on page 6 of this paper. Thus, Applicant requests that the objection to claim 16 be removed.

Applicant respectfully traverses the Section 102(b) rejection of claims 1-7, 9-13 and 15 because the cited portions of the Heinlen reference do not correspond to the claimed invention which includes, for example, aspects directed to the end portion of the second connection conductor being brought to a position opposite the position of the semiconductor element by bending along a bending axis that is at an oblique angle with respect to the longitudinal axis of the end portion. The cited portions of Heinlen do not teach that the end portion 18 (having contact arm 15 and contact arm 20 with tip 24) is bent along an axis that is at an oblique angle with respect to the longitudinal axis of the end portion (*i.e.*, bent along an axis that is neither perpendicular nor parallel to the longitudinal axis of the end portion).

The Heinlen reference teaches a specific series of bends that result in the tip 24 being located above heat sink 4, each of these bends is along an axis that is either perpendicular or parallel to the longitudinal axis of the tip 24 (Heinlen's tip 24 is asserted by the Office Action as corresponding to the claimed end portion of the second connection conductor). More specifically, contact arm 20 is bent upward at bend 50 (which is along an axis that is perpendicular to the longitudinal axis of the tip 24), the tip 24 is then formed by providing a downward bend at 52 (which is also along an axis that is

perpendicular to the longitudinal axis of the tip 24). Next the contact arm 15 is bent upward at bend 54 (which is along an axis that is parallel to the longitudinal axis of the tip 24), and finally the contact arm 15 is bent at bend 60 (which is along an axis that is perpendicular to the longitudinal axis of the tip 24) to place the tip 24 over the heat sink 4. *See, e.g.*, Figures 2-5 and Col. 3:38-50. Thus, none of the bends taught by the cited portions of the Heinlen reference are along an axis that is at an oblique angle with respect to the longitudinal axis of the end portion as in the claimed invention. Accordingly, the Section 102(b) rejection of claims 1-7, 9-13 and 15 is improper and Applicant requests that it be withdrawn.

Applicant further traverses the Section 102(b) rejection of claim 4 because the Office Action mischaracterizes the cited teaching of the Heinlen reference. The Office Action cites to Heinlen's outside leads (6 and 10 that each have an end portion 18) as corresponding to the claimed first and second connection conductors, and asserts that Heinlen teaches that a semiconductor device is applied to the end portion 18 of the outside lead 6. *See, e.g.*, page 4:14-19 of the instant Office Action. However, the cited portions of Heinlen teach that a transistor is placed on the upper surface of heat sink 4, not on the end portion 18 of the outside lead 6 as asserted by the Office Action. *See, e.g.*, Col. 2:55-58. Therefore, the Section 102(b) rejection of claim 4 is improper and Applicant requests that it be withdrawn.

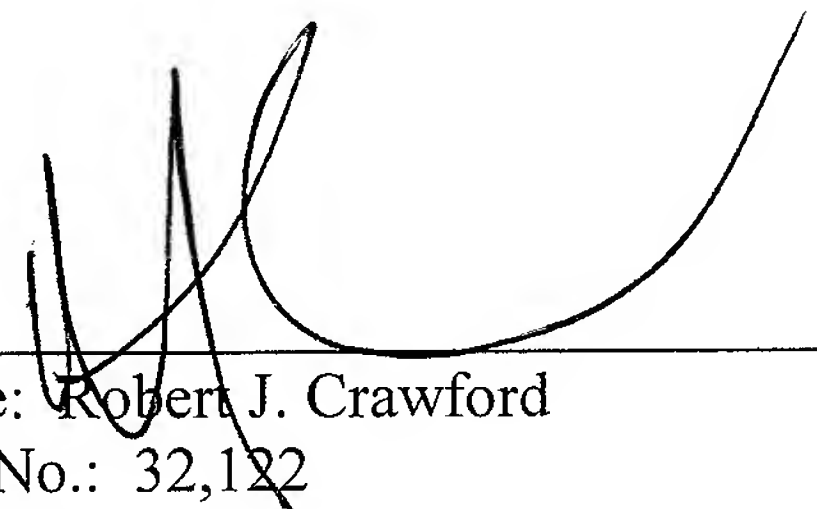
Applicant respectfully traverses the Section 103(a) rejection of claims 8 and 14 because the cited portions of the Heinlen reference do not correspond to the claimed invention as discussed above in relation to the Section 102(b) rejection. In at least this regard, the Section 103(a) rejection is improper because the rejection is based upon the same misinterpretation of the Heinlen reference. Therefore, Applicant requests that the Section 103(a) rejection of claims 8 and 14 be withdrawn.

In view of the remarks above, Applicant believes that each of the rejections has been overcome and the application is in condition for allowance. Should there be any remaining issues that could be readily addressed over the telephone, the Examiner is asked to contact the agent overseeing the application file, Peter Zawilski, of NXP Corporation at (408) 474-9063 (or the undersigned).

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